

Bradford J. Sandler, Esq. (NY Bar No. 4499877)  
Ilan D. Scharf, Esq. (NY Bar No. 4042107)  
Jason S. Pomerantz, Esq. (CA Bar No. 157216)  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, New York 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777

*Counsel to Plaintiff RDC Liquidating Trust*

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK**

In re:  ROCHESTER DRUG CO-OPERATIVE, INC.  Debtor.	Chapter 11  Case No. 20-20230 (PRW)
Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST,  Plaintiff,  v.  ALCON LABORATORIES, INC.,  Defendant.	Adv. Proc. No. 2-22-02061 (PRW)

**STIPULATION EXTENDING TIME TO ANSWER COMPLAINT**

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc., and defendant, Alcon Laboratories, Inc. (“Defendant”, and together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the “Summons”) was issued on February 4, 2022; and

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint.

The Parties hereby stipulate and agree to the matters set forth below:

1. The time by which Defendant is required to answer the Complaint is extended through and including April 15, 2022.

2. Defendant does not challenge personal jurisdiction and waives any objection to service of process of the Summons and Complaint in this adversary proceeding.

Respectfully submitted,

Dated: February 28, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

Bradford J. Sandler (NY Bar No. 4499877)

Ilan D. Scharf (NY Bar No. 4042107)

Jason S. Pomerantz (CA Bar No. 157216)

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Email: bsandler@pszjlaw.com

ischarf@pszjlaw.com

jspomerantz@pszjlaw.com

*Counsel to Plaintiff RDC Liquidating Trust*

Dated: March 2, 2022

SAUL EWING ARNSTEIN & LEHR LLP

Melissa Martinez

George P. Apostolides (IL Bar No. 6228768)

(pro hac vice admission pending)

161 North Clark, Suite 4200

Chicago, Illinois 60601

Telephone: (312) 876-7102

Email: george.apostolides@saul.com

-and-

Lucian Murley (DE Bar No. 4892)

(pro hac vice admission pending)

1201 North Market Street, Suite 2300

Wilmington, DE 19801

Telephone: (302) 421-6898

Email: luke.murley@saul.com

-and-

Melissa A. Martinez (PA Bar No. 322943)

(pro hac vice admission pending)

Centre Square West

1500 Market Street, 38th Floor

Philadelphia, PA 19102

Telephone: (215) 972 - 8572

Email: melissa.martinez@saul.com

*Counsel to Defendant Alcon Laboratories, Inc.*

SO ORDERED:

DATED: \_\_\_\_\_, 2022

Rochester, New York

\_\_\_\_\_  
HON. PAUL R. WARREN  
United States Bankruptcy Judge